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Jul 07 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Carmen Mullen, Circuit Court Judge

Appellate Case No. 2023-000924

Karon Mitchell, Kyle Mitchell, and
Rabon & Rabon, Inc.,

Respondents,

v.

Jack Rabon, Nicole Rabon, Lane
Jeffries, McNair Law Firm, P.A., Atid
Properties, LLC, Daisy Ridge, LLC,
Friends of LBS, LLC, Sarah Ginsburg,
Jacob Biderman, Gabriel Yosef, and
Michelle Cohen,

Defendants,

Of Whom:

Jack Rabon and Nicole Rabon,

Appellants,

and

Atid Properties, LLC and Jacob
Biderman,

Cross-Claimants,

v.

Michelle Cohen,

Cross-Defendant.

**MOTION TO EXTEND TIME TO FILE AN INITIAL BRIEF
AND DESIGNATION OF MATTER TO BE INCLUDED IN
RECORD ON APPEAL**

Appellants Jack Rabon and Nicole Rabon move pursuant to Rule 240, SCACR for
an order extending time to file and serve the Initial Brief and Designation of Matter to be

Included in Record on Appeal. Appellants request this extension in order to provide counsel sufficient time to adequately research and prepare these pleadings. Appellants submit that this motion is not interposed for delay. Appellants also request that the Court of Appeals hold all time limits in abeyance pending its ruling on this motion.

Respectfully submitted,

July 7, 2023

s/ D. Alan Lazenby
D. Alan Lazenby
Lazenby Law Firm, LLC
Post Office Box 6099
Spartanburg, South Carolina 29304
(864) 804-5050
alan@lazenbylawfirm.com
SC Bar No. 13906

Attorney for Appellants

Other Counsel of Record:

Lauren L. Martel, Esq.
Martel Law Office
243 Club Gate Drive
Bluffton, SC 29910

Tucker S. Player, Esq.
Player Law Firm, LLC
512 Village Church Drive
Chapin, SC 29036

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Of Whom:

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Appellants,

and

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Biderman,

Cross-Claimants,

v.

Michelle Cohen,

Cross-Defendant.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time on Respondents Karon Mitchell and Kyle Mitchell by electronic mail to their counsel of record, Lauren L. Martel, Esq., using her email address on file with the S.C. AIS, to wit: martellawsc@gmail.com.

I certify that I have served the Motion for Extension of Time on Respondent Rabon & Rabon,

Inc. by electronic mail to Tucker S. Player, Esq., using his email address on file with the S.C. AIS, to wit: tucker@playerlawfirm.com.

Respectfully submitted,

July 7, 2023

s/ D. Alan Lazenby
D. Alan Lazenby
Lazenby Law Firm, LLC
Post Office Box 6099
Spartanburg, South Carolina 29304
(864) 804-5050
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SC Bar No. 13906

Attorney for Appellants

Other Counsel of Record:

Lauren L. Martel, Esq.
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243 Club Gate Drive
Bluffton, SC 29910

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Alan Lazenby <alan@lazenbylawfirm.com>

Karon Mitchell v. Jack Rabon // Appellate Case No. 2023-000924

1 message

Alan Lazenby <alan@lazenbylawfirm.com>

Fri, Jul 7, 2023 at 4:53 PM

To: Tucker Player <tucker@playerlawfirm.com>, Lauren Martel <martellawsc@gmail.com>

Cc: "Rebekah S. Noell-Baba" <rebekah@lazenbylawfirm.com>, Jack and Nicole <sourmug2love@yahoo.com>

Tucker and Lauren,

Attached and herewith served upon you in this matter is a Motion to Extend Time to File an Initial Brief and Designation of Matter to be Included in Record on Appeal and Proof of Service. The copy of the Proof of Service to the Court will contain a print out indicating this message was sent to both of you.

I also attach a copy of my emailed correspondence to the Clerk of the Court of Appeals.

Alan

D. Alan Lazenby Attorney at Law, Lazenby Law Firm, LLC

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LAZENBY
LAW FIRM LLC

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**REPRESENTING INDIVIDUALS AND SMALL BUSINESSES IN SOUTH CAROLINA**

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3 attachments **Mot Ext 07.07.2023.pdf**
12K **Proof of Service 07.07.2023.pdf**
19K **Clerk from DAL re Mot Ext 07.07.2023.pdf**
144K



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July 7, 2023

VIA EMAIL ONLY

Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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Jul 07 2023

SC Court of Appeals

***Re: Karon Mitchell v. Jack Rabon
Appellate Case No. 2023-000924***

Dear Ms. Kitchings:

Enclosed please find our Motion to Extend Time to File an Initial Brief and Designation of Matter to be Included in Record on Appeal and Proof of Service in the above-captioned matter.

A check in the amount of \$50 to cover the filing fee will be sent separately in the mail.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'D. Alan Lazenby', is written over a light blue horizontal line.

D. Alan Lazenby
alan@lazenbylawfirm.com

DAL:
Enclosure

cc: Lauren L. Martel, Esq. (via email only)
Tucker S. Player, Esq. (via email only)